

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBBINS MOTOR TRANSPORTATION,)	
Plaintiff,)	CIVIL ACTION
)	
v.)	No. 02-CV-2745
)	(Harvey Bartle, III, U.S.D.J.)
TRANSPORT, S.R.S., INC. T/A S.R.S.)	
TRANSPORT T/A TRANSPORT S.R.S. and)	
SHIRLEY CONTRACTING CORPORATION)	
and NEW JERSEY TRANSIT CORPORATION)	
D/B/A NJ TRANSIT and XEBEC, INC. T/A)	
XEBEC and INTERNATIONAL BRIDGE)	
& IRON CO., INC.)	
Defendants.)	

ORDER

AND NOW, this _____ day of _____, 2002, upon consideration of the Motion of Defendant Transport S.R.S., Inc. for the Admission *Pro Hac Vice* of Daniel R. Seidberg, Esquire, pursuant to Local Rule of Civil Procedure 83.5.2(b), as counsel of record in the above-captioned matter for Transport S.R.S., Inc., it is hereby ORDERED that the Motion is GRANTED.

BY THE COURT:

Harvey Bartle, III, U.S.D.J.

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and NEW JERSEY TRANSIT CORPORATION)	
D/B/A NJ TRANSIT and XEBEC, INC. T/A)	
XEBEC and INTERNATIONAL BRIDGE)	
& IRON CO., INC.)	
Defendants.)	

**MOTION OF DEFENDANT TRANSPORT S.R.S., INC.
FOR THE ADMISSION *PRO HAC VICE* OF DANIEL R. SEIDBERG, ESQUIRE**

For the reasons set forth in the attached Memorandum of Law, the undersigned counsel, on behalf of Defendant Transport S.R.S., Inc. and pursuant to Local Rule of Civil Procedure 83.5.2(b), respectfully applies to the Court for the admission *Pro Hac Vice* of Daniel R. Seidberg, Esquire as counsel of record in the above-captioned matter for Transport S.R.S., Inc.

Respectfully submitted,

Dated: July 10, 2002



James W. Patterson.
Attorney I.D. No. 04547
Christine M. Kovan
Attorney I.D. No. 82428
SAUL EWING LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102
(215) 972-7824/(610) 251-5092

Attorneys for Defendant
Transport S.R.S., Inc.

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Defendants.)	

**MEMORANDUM OF LAW IN SUPPORT OF
THE MOTION OF DEFENDANT TRANSPORT S.R.S., INC.
FOR THE ADMISSION PRO HAC VICE OF DANIEL R. SEIDBERG, ESQUIRE**

Pursuant to Local Rule of Civil Procedure 83.5.2(b), the undersigned counsel, on behalf of Defendant Transport, S.R.S., Inc., respectfully applies to the Court for the admission *Pro Hac Vice* of Daniel R. Seidberg, Esquire as counsel of record in the above-captioned matter for Transport S.R.S., Inc. In support of this Motion, the undersigned counsel submits this Memorandum of Law and the attached Declarations of Daniel R. Seidberg, Esquire and James W. Patterson, Esquire.

I. DANIEL R. SEIDBERG, ESQUIRE

Daniel R. Seidberg, Esquire is an associate at the law firm of Pinsky & Skandalis in Syracuse, New York. See Declaration of Daniel R. Seidberg, Esquire (attached hereto as Exhibit "A"). Mr. Seidberg is a member in good standing of the Bars of the State of New York and the Commonwealth of Massachusetts. See id. at ¶¶ 1, 3. Mr. Weiss is also a member in good standing of the Bar of the Commonwealth of Pennsylvania and is currently on voluntarily assumed inactive status. See id. at ¶¶ 2, 3. Further, he is admitted to practice in

the United States District Court for the Northern District of New York See id. at ¶¶ 1, 3. Mr. Weiss has never been subject to disciplinary proceedings of any kind by any of the jurisdictions or courts to which he is admitted. See id. at ¶ 3.

II. ATTESTATION OF GOOD MORAL AND PROFESSIONAL CHARACTER

The undersigned counsel is a partner in the law firm of Saul Ewing LLP in Philadelphia, Pennsylvania, and has been a member in good standing of the Bar of the Commonwealth of Pennsylvania since 1965. See Declaration of James W. Patterson at ¶ 1 (attached hereto as Exhibit "B"). He is admitted to practice before the courts of the Commonwealth of Pennsylvania, the U.S. District Courts for the Eastern District of Pennsylvania and the District of Columbia and the United States Courts of Appeals for the Third Circuit and District of Columbia Circuit. See id. at ¶ 2.

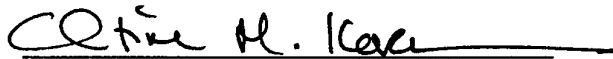
The undersigned counsel attests to the upstanding moral character and professional reputation of Daniel R. Seidberg, Esquire. See id. at ¶ 3. Finally, the undersigned counsel agrees to function as associate counsel of record on behalf of Daniel R. Seidberg, Esquire in the Eastern District of Pennsylvania, as required by Local Rule of Civil Procedure 83.5.2(a), upon whom all pleadings, motions, notices and other papers in this action can be served, and who will be available to appear before the Court with respect to any matter arising in this action. See id.

III. CONCLUSION

For each of the foregoing reasons, the undersigned counsel, on behalf of Defendant Transport S.R.S., Inc., respectfully applies to the Court for the admission *Pro Hac Vice* of Daniel R. Seidberg, Esquire as counsel of record for Transport S.R.S., Inc. in this matter.

Respectfully submitted,

Dated: July 10, 2002



James W. Patterson
Attorney I.D. No. 04547
Christine M. Kovan
Attorney I.D. No. 82428
SAUL EWING LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102
(215) 972-7824/(610) 251-5092

Attorneys for Defendant
Transport S.R.S., Inc.

EXHIBIT A

The United States District Court
For the Eastern District of Pennsylvania

ROBBINS MOTOR TRANSPORTATION, INC.

v.

Civil Action No.:
02-2745

TRANSPORT, S.R.S., INC. T/A S.R.S. TRANSPORT T/A
TRANSPORT S.R.S. and SHIRLEY CONTRACTING
CORPORATION and NEW JERSEY TRANSIT
CORPORATION D/B/A/ NJ TRANSIT and XEBEC, INC.
T/A XEBEC AND INTERNATIONAL BRIDGE
& IRON CO., INC.

AFFIDAVIT IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE

Daniel R. Seidberg, Esq., being duly sworn hereby deposes and
states as follows:

1. I am an attorney duly admitted to practice law in the
State of New York, and the Commonwealth of Massachusetts. I am
also admitted to practice before the United States District Court
for the Northern District of New York. My New York State attorney
Registration number is 2591766; My Commonwealth of Massachusetts
Board of Bar Overseers number is 600532; and my Federal Court bar
roll number is 507192.

2. I am also admitted to practice law in the Commonwealth of
Pennsylvania. However, I am currently on such voluntary inactive
status in the Commonwealth, and have been on inactive status since
December 9, 1998. My Commonwealth of Pennsylvania attorney

identification number is 71968.

3. With the sole exception of my voluntarily assuming inactive status in the Commonwealth of Pennsylvania in 1998 because I was no longer practicing law within the Commonwealth of Pennsylvania, I am a member of good standing in each bar and court to which I have been admitted for the practice of law. I have never been the subject of any professional disciplinary action in any of the jurisdictions to which I have been admitted to practice law.

4. I make this affidavit in support of a motion to be admitted *Pro Hac Vice* on behalf of Defendant Transport S.R.S., Inc. in the above-entitled matter. Transport S.R.S., Inc. is a client of Pinsky & Skandalis, the firm with which I am associated in Syracuse, New York

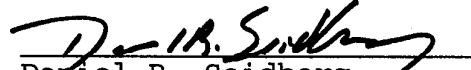
5. I believe that it is in the best interest of my client, Transport S.R.S., Inc., for me to be admitted *Pro Hac Vice* to this court for the purpose of representing this client in this matter.

6. For the representation of Transport S.R.S., Inc. in this matter, my firm has associated with the law firm of Saul Ewing, LLP, which firm will serve as local counsel for my office in this matter. Saul Ewing, LLP is located at 3800 Centre Square West, Philadelphia, Pennsylvania 19102.

7. Wherefore, I respectfully request an order of this Honorable Court admitting me to practice before this court *Pro Hac Vice* on behalf of Defendant Transport S.R.S., Inc. in this matter,

together with such other and further relief as to the Court may appear just and appropriate.

Dated: May 29, 2002


Daniel R. Seidberg
Attorney for Defendant
Transport S.R.S., Inc.
PINSKY & SKANDALIS
5790 Widewaters Parkway
PO Box 250
Syracuse, NY 13214-0250
(315) 446-2384
Bar Roll No.: 507192

Sworn to before me this
29th day of May, 2002


Notary Public

BRADLEY M. PINSKY
NOTARY PUBLIC, State of New York
Qualified in Broome Co. No. 5076850
Commission Expires April 28, 2007

EXHIBIT B

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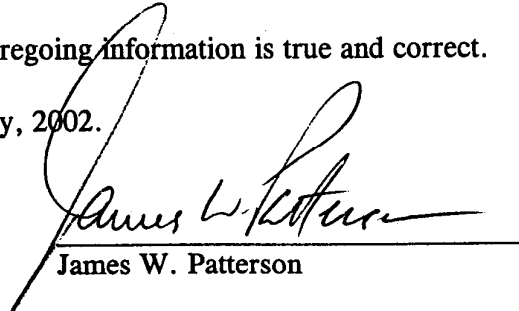
DECLARATION OF JAMES W. PATTERSON, ESQUIRE

1. I am a Partner in the law firm of Saul Ewing LLP in Philadelphia, Pennsylvania. I have been a member in good standing of the Bar of the Commonwealth of Pennsylvania since 1965.
2. I am admitted to practice before the courts of the Commonwealth of Pennsylvania, the U.S. District Courts for the Eastern District of Pennsylvania and District of Columbia, and the United States Courts of Appeals for the Third Circuit and District of Columbia Circuit.
3. I attest to the upstanding moral character and professional reputation of Daniel R. Seidberg, Esquire. I have agreed to function as associate counsel of record on behalf of these counsel in the Eastern District of Pennsylvania, as required by Local Rule of Civil Procedure 83.5.2(a), such that all pleadings, motions, notices and other papers in this

action can be served upon me, and I will be available to appear before the Court with respect to any matter arising in this action.

In accordance with 42 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America the foregoing information is true and correct.

Executed on this 10th day of July, 2002.



James W. Patterson


CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true and correct copy of the foregoing Motion of Defendant Transport S.R.S., Inc. for the Admission *Pro Hac Vice* of Daniel R. Seidberg, Esquire, with supporting Memorandum of Law and Declarations, to be served via U.S. Mail, postage prepaid, upon the following:

James F. Peoples, Esquire
2701 West Chester Pike
Suite 104
Broomall, PA 19008

Derek Eddy, Esquire
Harry R. Blackburn & Associates, PC
1610 Spruce Street
Philadelphia, PA 19103

Daniel R. Seidberg, Esquire
Pinsky & Skandalis
5790 Widewaters Parkway
P.O. Box 250
Syracuse, NY 13214-0250


Christine M. Kovan

Dated: July 10, 2002